

Remarks

The Office Action mailed February 3, 2003 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-3, 7-8, 11-23, 25-27, and 29-33 are pending in this application. Claims 1-35 stand rejected. Claims 4-6, 9-10, 24, 28, and 34-35 have been canceled.

In accordance with 37 C.F.R. 1.136(a), a three month extension of time is submitted herewith to extend the due date of the response to the Office Action dated February 3, 2003, for the above-identified patent application from May 3, 2003, through and including August 3, 2003. In accordance with 37 C.F.R. 1.17(a)(3), authorization to charge a deposit account in the amount of \$930 to cover this extension of time request also is submitted herewith.

The rejection of Claims 1-4, 6, 7-8, 21-22, and 31-34 under 35 U.S.C. § 102(e) as being anticipated by Brunius (US Patent No. 6,204,760B1) is respectfully traversed.

Brunius describes a security system for a building that utilizes a main controller in communication with a unit controller that receives signals from at least one sensor. The unit controller communicates a provisional alarm to the main controller upon the sensing of a security condition.

Claim 1 recites "a method at a phone-interface device, comprising: receiving a provisional-alarm report, determining whether a disarm command has been received subsequent to receipt of the provisional-alarm report, when a disarm command has not been received before expiration of a period of time, sending a system condition to a monitoring station including seizing a telephone line, and calling the monitoring station via the telephone line, and determining whether the calling element is successful, and when the calling element is not successful, sending the alarm condition to the monitoring station via an alternative communications link.

Brunius does not describe nor suggest determining whether the calling element was successful and when the calling element is not successful, sending the alarm condition to the

monitoring station via an alternative communications link. Brunius does not describe nor suggest any alternative communications links from the phone interface device to the monitoring station. For the reasons set forth above, Claim 1 is submitted to be patentable over Brunius.

Claims 2 and 3 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2 and 3 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2 and 3 likewise are patentable over Brunius.

Claims 4 and 6 have been canceled

Claim 7 recites "a phone-interface device, comprising a receiver to receive a wireless signal from a control panel, wherein the wireless signal encodes information regarding a system condition, and a phone port to connect to a communications link, wherein the phone port is to dial a telephone number of a monitoring station in response to receiving the wireless signal and the communications link is at least one of an ISDN line and wireless.

Brunius does not describe nor suggest a communication link between a phone interface device and a monitoring station that is at least one of an ISDN line and wireless. For the reasons set forth above, Claim 7 is submitted to be patentable over Brunius.

Claim 8 depends from independent Claim 7. When the recitations of Claim 8 are considered in combination with the recitations of Claim 7, Applicants submit that dependent Claim 8 likewise is patentable over Brunius.

Claim 21 recites "a security system, comprising a control panel to receive a sensor event from a security device, to translate the sensor event into a system condition, and to transmit a wireless signal to a phone-interface device, wherein the wireless signal encodes information regarding the system condition and a phone-interface device to receive the wireless signal from the control panel, wherein the phone-interface device is packaged separately from the control panel, wherein the phone-interface device receives direct electric current from an energy storage device.

Brunius does not describe nor suggest a security system wherein the phone-interface device receives direct electric current from an energy storage device. For the reasons set forth above, Claim 21 is submitted to be patentable over Brunius.

Claim 22 depends from Claim 21. When the recitations of Claim 22 are considered in combination with the recitations of Claim 21, Applicants submit that dependent Claim 22 likewise is patentable over Brunius.

Claim 31 recites "a program product comprising a signal-bearing media bearing instructions, which when read and executed by a processor, comprise receiving a provisional-alarm report, determining whether a disarm command has been received subsequent to receipt of the provisional-alarm report, when a disarm command has not been received before expiration of a period of time, sending a system condition to a monitoring station including seizing a telephone line, and calling the monitoring station via the telephone line, and determining whether the calling is successful, and when the calling is not successful, sending the alarm condition to the monitoring station via an alternative communications link.

Brunius does not describe nor suggest determining whether the calling is unsuccessful and when the calling is not successful, sending the alarm condition to the monitoring station via an alternative communications link. For the reasons set forth above, Claim 31 is submitted to be patentable over Brunius.

Claim 34 has been canceled.

Claims 32-33 depend from Claim 31. When the recitations of Claims 32-33 are considered in combination with the recitations of Claim 31, Applicants submit that dependent Claims 32-33 likewise are patentable over Brunius.

For the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1-4, 6, 7-8, 21-22, and 31-34 be withdrawn.

The rejection of Claims 11-12, 14, and 16-20 under 35 U.S.C. § 102(b) as being anticipated by Heald et al. (US Patent No. 5,553,138) is respectfully traversed.

Heald et al. describes a computer system including a modem that communicates via a telephone line. The computer is charged during operation and receives power from a capacitor. Heald et al do not describe a security system telephone interface device. *not claimed*

Claim 11 recites a "phone-interface device, comprising: a phone port to draw electrical energy from a phone line, wherein the phone port is part of a premise phone system, and wherein the electrical energy drawn from the phone line is within a current and voltage profile of the premise phone system."

Heald et al do not describe a security system phone interface device. Rather, Heald et al describe a telephone modem for computer equipment and for a base station unit. Accordingly, Claim 11 is submitted to be patentable over Heald et al.

Claims 12, 14, and 16-20 depend from Claim 11. When the recitations of Claims 12, 14, and 16-20 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 12, 14, and 16-20 likewise are patentable over Heald et al.

For the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 11-12, 14, and 16-20 be withdrawn.

The rejection of Claims 5, 10 and 35 under 35 U.S.C. § 103(a) as being unpatentable over Brunius in view of Dop et al. (US Patent No. 4,887,290) is respectfully traversed.

Claims 5, 10, and 35 have been canceled.

Accordingly, for the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 5, 10, and 35 be withdrawn.

The rejection of Claim 9 under 35 U.S.C. § 103(a) as being unpatentable over Brunius in view of Peters (US Patent No. 5,717,379) is respectfully traversed.

Claim 9 has been canceled.

Accordingly, for the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claim 9 be withdrawn.

The rejection of Claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Heald et al. in view of Ulrich (US Patent No. 4,803,719) is respectfully traversed.

Ulrich describes a method for powering a telephone apparatus from the telephone line.

Claim 13 depends from Claim 11 which recites a "phone-interface device, comprising: a phone port to draw electrical energy from a phone line, wherein the phone port is part of a premise phone system, and wherein the electrical energy drawn from the phone line is within a current and voltage profile of the premise phone system."

Neither Heald et al nor Ulrich describe nor suggest a security system phone interface device. Rather, Heald et al describe a telephone modem for computer equipment and for a base station unit, and Ulrich describes an apparatus for a pay telephone, key telephone, or modem.

In addition, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. The required teaching, suggestion and incentive supporting the Examiner's combination is absent here. Neither Heald et al nor Ulrich teach or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Heald et al with Ulrich because there is no motivation to combine these references suggested in the art. The Examiner has not pointed to any prior art that teaches or suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991).

In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown. Specifically, the Examiner has not pointed to any prior art that teaches or suggests a reasonable expectation of success or motivation in combining the references.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is apparently based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Since there is no teaching, suggestion, or motivation in the cited references for the claimed combination recited in Claim 13, the Section 103 rejection of Claim 13 appears to be based on impermissible hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible.

Accordingly, for the reasons set forth above, Claim 13 is submitted to be patentable over Heald et al. in view of Ulrich.

The rejection of Claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Heald et al. in view of MacTaggart (US Patent No. 5,446,784) is respectfully traversed.

MacTaggart describes an apparatus for coupling a telephone line to a telephone line subscriber device.

Claim 15 depends from Claim 11 which recites a "phone-interface device, comprising: a phone port to draw electrical energy from a phone line, wherein the phone port

is part of a premise phone system, and wherein the electrical energy drawn from the phone line is within a current and voltage profile of the premise phone system."

Neither Heald et al nor MacTaggart describe nor suggest a security system phone interface device. Rather, Heald et al describe a telephone modem for computer equipment and for a base station unit, and MacTaggart describes an apparatus for coupling a telephone line to a telephone line subscriber device.

In addition, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. The required teaching, suggestion and incentive supporting the Examiner's combination is absent here. Neither Heald et al nor MacTaggart teach or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Heald et al with MacTaggart because there is no motivation to combine these references suggested in the art. The Examiner has not pointed to any prior art that teaches or suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown. Specifically, the Examiner has not pointed to any prior art that teaches or suggests a reasonable expectation of success or motivation in combining the references.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose

among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is apparently based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Since there is no teaching, suggestion, or motivation in the cited references for the claimed combination recited in Claim 15, the Section 103 rejection of Claim 15 appears to be based on impermissible hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible.

Accordingly, for the reasons set forth above, Claim 15 is submitted to be patentable over Heald et al. in view of MacTaggart.

The rejection of Claim 23 under 35 U.S.C. § 103(a) as being unpatentable over Brunius in view of Otto (US Patent No. 6,442,240B1) is respectfully traversed.

Otto describes a hostage negotiation system including a throw module and a command unit connected by a communication cable.

Claim 23 depends from Claim 21 which recites a "security system, comprising: a control panel to receive a sensor event from a security device, to translate the sensor event into a system condition, and to transmit a wireless signal to a phone-interface device, wherein the wireless signal encodes information regarding the system condition; and a phone-interface device to receive the wireless signal from the control panel, wherein the phone-interface device is packaged separately from the control panel, wherein the phone-interface device receives direct electric current from an energy storage device."

Neither Brunius nor Otto describe or suggest a security system wherein the phone-interface device receives direct electric current from an energy storage device. Rather, Brunius describes a security system without a description of the current received by the

control panel and Otto does not describe nor suggest a phone interface device that receives direct electric current from an energy source.

In addition, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. The required teaching, suggestion and incentive supporting the Examiner's combination is absent here. Neither Brunius nor Otto teach or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Brunius with Otto because there is no motivation to combine these references suggested in the art. The Examiner has not pointed to any prior art that teaches or suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown. Specifically, the Examiner has not pointed to any prior art that teaches or suggests a reasonable expectation of success or motivation in combining the references.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection

is apparently based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Since there is no teaching, suggestion, or motivation in the cited references for the claimed combination recited in Claim 23, the Section 103 rejection of Claim 23 appears to be based on impermissible hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible.

Accordingly, for the reasons set forth above, Claim 23 is submitted to be patentable over Brunius in view of Otto.

The rejection of Claims 24 and 27 under 35 U.S.C. § 103(a) as being unpatentable over Brunius in view of Heald et al is respectfully traversed.

Claim 24 and 27 depend from Claim 21 which recites a “security system, comprising: a control panel to receive a sensor event from a security device, to translate the sensor event into a system condition, and to transmit a wireless signal to a phone-interface device; wherein the wireless signal encodes information regarding the system condition; and a phone-interface device to receive the wireless signal from the control panel, wherein the phone-interface device is packaged separately from the control panel, wherein the phone-interface device receives direct electric current from an energy storage device.”

As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. The required teaching, suggestion and incentive supporting the Examiner’s combination is absent here. Neither Brunius nor Heald et al teach or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Brunius with Heald because there is no motivation to combine these references suggested in the art. The Examiner has not pointed to any prior art that teaches or suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown. Specifically, the Examiner has not pointed to any prior art that teaches or suggests a reasonable expectation of success or motivation in combining the references.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is apparently based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Since there is no teaching, suggestion, or motivation in the cited references for the claimed combination recited in Claims 24 and 27, the Section 103 rejection of Claims 24 and 27 appear to be based on impermissible hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible.

Accordingly, for the reasons set forth above, Claims 24 and 27 are submitted to be patentable over Brunius in view of Heald.

The rejection of Claims 25 and 26 under 35 U.S.C. § 103(a) as being unpatentable over Brunius in view of Heald et al and further in view of Ulrich is respectfully traversed.

Claim 25 and 26 depend from Claim 21 which recites a "security system, comprising: a control panel to receive a sensor event from a security device, to translate the sensor event into a system condition, and to transmit a wireless signal to a phone-interface device, wherein the wireless signal encodes information regarding the system condition; and a phone-interface device to receive the wireless signal from the control panel, wherein the phone-interface device is packaged separately from the control panel, wherein the phone-interface device receives direct electric current from an energy storage device."

As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. The required teaching, suggestion and incentive supporting the Examiner's combination is absent here. None of Brunius, Heald et al, nor Ulrich teach or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Brunius with Heald et al and Ulrich because there is no motivation to combine these references suggested in the art. The Examiner has not pointed to any prior art that teaches or suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown. Specifically, the Examiner has not pointed to any prior art that teaches or suggests a reasonable expectation of success or motivation in combining the references.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose

among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is apparently based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Since there is no teaching, suggestion, or motivation in the cited references for the claimed combination recited in Claims 25 and 26, the Section 103 rejection of Claims 25 and 26 appear to be based on impermissible hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible.

Accordingly, for the reasons set forth above, Claims 25 and 26 are submitted to be patentable over Brunius in view of Heald et al. and further in view of Ulrich.

The rejection of Claims 28-30 under 35 U.S.C. § 103(a) as being unpatentable over Brunius in view of Addy (US Patent No.; 6,288,639B1) is respectfully traversed.

Addy describes a method for installing wireless security devices.

Not
Claim 28 has been canceled.

Claims 29-30 depend from Claim 21 which recites a "security system, comprising: a control panel to receive a sensor event from a security device, to translate the sensor event into a system condition, and to transmit a wireless signal to a phone-interface device, wherein the wireless signal encodes information regarding the system condition; and a phone-interface device to receive the wireless signal from the control panel, wherein the phone-interface device is packaged separately from the control panel, wherein the phone-interface device receives direct electric current from an energy storage device.

Neither Brunius nor Addy describe or suggest a security system wherein the phone-interface device receives direct electric current from an energy storage device. Rather,

Brunius describes a security system without a description of the current received by the control panel and Addy describes a method for installing wireless security devices.

As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. The required teaching, suggestion and incentive supporting the Examiner's combination is absent here. Neither Brunius nor Addy teach or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Brunius with Addy because there is no motivation to combine these references suggested in the art. The Examiner has not pointed to any prior art that teaches or suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown. Specifically, the Examiner has not pointed to any prior art that teaches or suggests a reasonable expectation of success or motivation in combining the references.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection

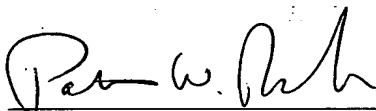
is apparently based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention.

Since there is no teaching, suggestion, or motivation in the cited references for the claimed combination recited in Claims 29-30, the Section 103 rejection of Claims 29-30 appear to be based on impermissible hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible.

Accordingly, for the reasons set forth above, Claims 29-30 are submitted to be patentable over Brunius in view of Addy.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



Patrick W. Rasche
Registration No. 37,916
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070